

IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
2009 JAN 29 P 4:07

KIMME PUTMAN,  
Appellant,

v.

WENATCHEE VALLEY  
MEDICAL CENTER, P.S., a  
Washington professional service  
corporation;

Respondents.

PATRICK J. WENDT, M.D.;  
DAVID B. LEVITSKY, M.D.;  
and JOHN DOE NO. 1; JOHN  
DOE NO. 2; JANE DOE NO. 1;  
AND JANE DOE NO. 2,

Defendants.

No. 80888-1

BY RONALD R. CARPENTER  
CLERK

APPELLANT PUTMAN'S  
STATEMENT OF  
ADDITIONAL AUTHORITIES

Appellant Kimme Putman submits the following additional  
authorities, identifying the issue for each, under RAP 10.8:

- *Woods v. Unity Health Center, Inc.*, 196 P.3d 529 (Okla. 2008);

**Issue 4: prohibition against special laws**, Wash. Const. art. II, §  
28.

- *EOG Resources Marketing, Inc. v. Oklahoma State Bd. of*

*Equalization*, 196 P.3d 511 (Okla. 2008); **Issue 4: prohibition**

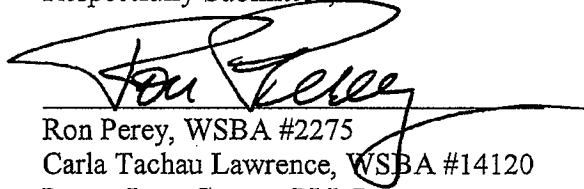
**against special laws**, Wash. Const. art. II, § 28.

- *Jones v. Integris Baptist Medical Center*, 178 P.3d 191 (Okla. App. 2008).
  - **Issue 4: prohibition against special laws**, Wash. Const. art. II, § 28;
  - **Issue 3: due process**, Wash. Const. art. 1, § 3; U.S. Const. amend. XIV, § 1.
- *Seisinger v. Siebel*, 195 P.3d 200 (Ariz. App. Jun 17, 2008), *review granted* (Oct 28, 2008); **Issue 1: separation of powers**, Wash. Const. art. IV, § 1.
- *Newton v. Clinical Reference Laboratory, Inc.*, 517 F.3d 554 (8th Cir. 2008); **Issue 1: separation of powers**, Wash. Const. art. IV, § 1.
- *McClain v. Clark*, 992 So.2d 636 (Miss. 2008); **Issue 1: separation of powers**, Wash. Const. art. IV, § 1.
- *Wimley v. Reid*, 991 So.2d 135, 138 (Miss. 2008); **Issue 1: separation of powers**, Wash. Const. art. IV, § 1.
- *Potter v. Washington State Patrol*, 165 Wn.2d 67, 196 P.3d 691 (2008); **Issue 2: right to remedy; open access to courts**, Wash. Const. art. I, § 10.
- *Morris v. Swedish Health Services*, --- P.3d ----, 2009 WL 117550 (Wash. App. Jan. 20, 2009); **General issue: first Washington**

published decision regarding certificate of merit requirement;  
vicarious liability of clinic.

Dated: January 29, 2009

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ron Perey", is written over a horizontal line. The signature is stylized with a large, sweeping initial "R".

Ron Perey, WSBA #2275

Carla Tachau Lawrence, WSBA #14120

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**CERTIFICATE OF SERVICE**

2009 JAN 29 PM 4:08

I certify that on January 29, 2009, I caused a true and correct  
copy of APPELLANT PUTMAN'S STATEMENT OF ADDITIONAL  
AUTHORITIES to be delivered via U.S. Mail, postage prepaid, to the  
following attorneys:

BY RONALD R. CARPENTER  
CLERK

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**DATED** this 29<sup>th</sup> day of January, 2009 at Seattle, Washington.

PEREY LAW GROUP, PLLC

  
A handwritten signature in cursive script, appearing to read "Sara Farris", is written over a horizontal line.

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